

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GARY KOOPMANN, TIMOTHY KIDD and
VICTOR PIRNIK, Individually and on Behalf of
All Others Similarly Situated,

Plaintiffs,

v.

FIAT CHRYSLER AUTOMOBILES N.V.,
FCA US LLC, SERGIO MARCHIONNE,
SCOTT KUNSELMAN, MICHAEL DAHL,
STEVE MAZURE and ROBERT E. LEE,

Defendants.

No. 15 Civ. 7199 (JMF)

**DECLARATION OF JOSHUA S. LEVY IN SUPPORT OF
DEFENDANTS' LETTER-MOTION TO MODIFY THE SCHEDULE**

I, Joshua S. Levy, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of this Court and am associated with the law firm of Sullivan & Cromwell LLP ("S&C"), counsel for Defendants in the above-captioned action.
2. I respectfully submit this Declaration in support of Defendants' letter-motion requesting a three-month extension of the fact discovery deadline and corresponding adjustments to later deadlines.
3. Attached hereto as Exhibit A is a true and correct copy of the transcript of a case management conference held on June 1, 2018 in *In re Chrysler-Dodge-Jeep Ecodiesel Marketing, Sales Practices, and Products Liability Litigation*, No. 17-md-2777 (N.D. Cal.) (Chen, J.).
4. Attached hereto as Exhibit B is a true and correct copy of the Judicial Panel on Multidistrict Litigation's Order Denying Transfer in *In re Chrysler-Dodge-Jeep Ecodiesel Mktg., Sales Practices, & Prod. Liab. Litig.*, MDL No. 2777 (J.P.M.L. Apr. 5, 2018).

5. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' Memorandum [*sic*] of Law in Support of Interested Party Response to Defendants' Motion to Transfer the *Prnik* [*sic*] Action to the MDL for Coordinated Pre-Trial Proceedings, dated January 9, 2018, in *In re Chrysler-Dodge-Jeep Ecodiesel Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 2777 (J.P.M.L.), ECF No. 140.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of June 2018, in New York, New York.

/s/ Joshua S. Levy
Joshua S. Levy